

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS**

DANA SAUNDERS,

Plaintiff,

v.

PETRO-CHEMICAL TRANSPORT, LLC

Defendant.

Case No. 3:23-CV-01974

**DEFENDANT PETRO-CHEMICAL TRANSPORT, LLC’S UNOPPOSED MOTION
FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT**

Defendant Petro-Chemical Transport, LLC (“PCT” or “Defendant”), through counsel, respectfully moves for a thirty-day extension of time to file its responsive pleading to Plaintiff Dana Saunders’ (“Plaintiff”) Complaint, to and including December 7, 2023. Plaintiff does not oppose the relief requested in Defendant’s Motion. In support of its Motion, PCT states as follows:

1. On September 1, 2023, Plaintiff Dana Saunders (“Plaintiff”) commenced a civil action against PCT by filing a Collective Action Complaint (the “Complaint”) in the United States District Court for the Northern District of Texas. (ECF No. 1.)

2. On or about October 16, 2023, Plaintiff served a copy of the Complaint and Summons on PCT.

3. PCT and its counsel are investigating the allegations of Plaintiff’s Complaint and require additional time to complete their investigation and to prepare PCT’s response to Plaintiff’s Complaint. PCT therefore respectfully requests a 30-day extension of time, to and including December 7, 2023, to respond to the Complaint.

4. This is PCT's first request for an extension of time. This request is made in good faith and not for the purpose of delay, or for any other improper purpose. Neither party would be prejudiced by the brief extension of time sought by this Motion.

5. Counsel for PCT conferred with counsel for Plaintiff on November 7, 2023. Plaintiff does not oppose the requested extension.

WHEREFORE, Petro-Chemical Transport, LLC respectfully requests that the Court enter an order extending the deadline for filing its responsive pleading to Plaintiff's Complaint, to and including December 7, 2023.

DATED: November 8, 2023

Respectfully submitted,

Petro-Chemical Transport, LLC

By: /s/ Emilee Crowther

**Attorney for Petro-Chemical Transport,
LLC**

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Counsel for Defendant Petro-Chemical Transport, LLC

CERTIFICATE OF CONFERENCE

On November 7, 2023, counsel for Defendant conferred with Douglas B. Welmaker, attorney for Plaintiff. Counsel for Plaintiff had no opposition to this Motion for Extension of Time to File Response to Complaint and he concurred that the extension of time was warranted.

/s/ Emilee Crowther
Emilee Crowther, Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was filed through the Court's CM/ECF System and served on Counsel of Record.

/s/ Jennifer McCleary
Jennifer McCleary

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**ORDER GRANTING DEFENDANT'S UNOPPOSED MOTION FOR
EXTENSION OF TIME**

After review of Defendant Petro-Chemical Transport, LLC's Unopposed Motion for Extension of Time to Respond to Plaintiff Dana Saunders' Complaint, the Court hereby **GRANTS** the Motion in its entirety. Defendant Petro-Chemical Transport, LLC's Response is due in this matter on or before December 7, 2023.

IT IS SO ORDERED.

DATE: _____

JUDGE PRESIDING